

5-15-81

FROM: JIM TURNER
TO: BENNETT STUKES

SUBJ: STATUS REPORT ON:
OLIN SITE - HOUSTON, TX

FACTS

OLIN CORP - S P OLN

TXD 000 607028

A December 4, 1980, inspection of this site in Northeast Houston was made by FIT. Laboratory results returned in January 1981 revealed the presence of toxaphene and pentachloronitrobenzene, pesticides, in very heavy concentrations in small piles adjacent to the site. The Piles were in the right-of-way of Houston Belt & Terminal Railroad (HB&T). HB&T was notified of the problem by phone and letter by Region 6 and they hired Rollins Environmental Services as a consultant for cleanup. Rollins cleaned up the piles, but some site analysis performed by them indicated that contamination might be widespread at the site. After consultations between Region 6 Legal Branch and General Branch of the Enforcement Division and the Surveillance and Analysis Division, a followup site inspection was performed by Region 6 FIT on February 3 and 4, 1981.

Lab report and inspection report were received in April 81. Report confirmed additional high levels of DDT, TOXAPHENE and PCNB located in the northeast quadrant of the site, in the railroad rt. of way adjoining the site, and in the residential area just to the north of the site. At the April Task Force meeting a strategy was developed - i.e. go with demand letters to Olin (former site owner), So. Pacific Transport Co. (current site owner), and Houston Belt & Terminal Railroad (adjoining land owner). Demand letter has been prepared by GE-LG (Turner) and is being typed. Demand will seek cleanup plans within 30 days.

CLAIMS FOR RELIEF / ISSUES

STRATEGY WOULD DICTATE THAT ANY REMOVAL BE CONDUCTED UNDER THE PURVIEW OF THE COURT.

CLAIM FOR RELIEF WOULD BE GROUNDED IN SECTION 3007 RCRA - IMMINENT HAZARD



200001

BACKED UP BY § 504, CWA, IMMINENT HAZARD.
INJUNCTIVE RELIEF WILL BE SOUGHT -
TEMP. & PERMANENT.

ACTION

WITH ABOVE STRATEGY IN MIND, A
FORMAL CASE DEVELOPMENT PLAN SHOULD
BE DEVELOPED AND A PLANNED APPROACH
FOR DEALING WITH THE RESPONSES OF
THE PARTIES WORKED OUT.

STAFF

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